

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY’S HOUSE
RECORDINGS INC., CE OPCO, LLC d/b/a
COMBS GLOBAL f/k/a COMBS
ENTERPRISES, LLC, BAD BOY
ENTERTAINMENT HOLDINGS, INC., BAD
BOY PRODUCTIONS HOLDINGS, INC., BAD
BOY BOOKS HOLDINGS, INC., BAD BOY
RECORDS LLC, BAD BOY ENTERTAINMENT
LLC, BAD BOY PRODUCTIONS LLC,
ORGANIZATIONAL DOES 1-10, INDIVIDUAL
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

NOTICE OF MOTION TO DISMISS

(ORAL ARGUMENT REQUESTED)

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support thereof, the Declaration of Alex Spiro, dated February 4, 2025 and all prior pleadings and proceedings herein, Shawn Carter will move this Court before the Hon. Analisa Torres, by the undersigned counsel, at the Daniel Patrick Moynihan, U.S. Courthouse, 500 Pearl St., New York, NY 10007, at a date and time to be determined by this Court, for an order dismissing Plaintiff’s Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for such other and further relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court’s Order dated January 2, 2025 (ECF 59), opposition papers, if any, shall be filed on or before February 28, 2025, and

Mr. Carter's reply in further support, if any, shall be filed by March 14, 2025.

Respectfully submitted,

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

Dated: New York, New York
February 4, 2025

By: /s/ Alex Spiro

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Attorney for Shawn Carter